



January 30, 2018

The dates set forth below  
are adopted as the  
schedule going forward.

Via ECF

The Honorable Robert W. Lehrburger,  
United States District Court for the,  
Southern District of New York,  
500 Pearl Street,  
New York, NY 10007-1312.

SO ORDERED:

Re: *Chen-Oster, et al. v. Goldman, Sachs & Co., et al.*  
No. 10 Civ. 6950 (AT) (RWL)

HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE

Dear Judge Lehrburger:

On behalf of all parties, we write in response to the Court's January 23 Order directing that "the parties are to meet and confer to discuss a schedule for class certification and briefing," with "Plaintiffs' reply brief . . . due no later than December 3, 2018." The parties have conferred and jointly propose the following schedule, which accords with the time limits set forth in the Order:

Event	Parties' Joint Proposal
<b>Data and Document Discovery</b>	
Document and data production completed	March 30, 2018
Fact discovery completed	March 30, 2018
<b>Expert Discovery</b>	
Plaintiff new/revised reports	June 29, 2018
Depositions of Plaintiffs' experts	July 17, 2018
Defendant new/revised reports	August 1, 2018
Depositions of Defendant experts	August 15, 2018
Plaintiffs reply expert reports	August 29, 2018
<b>Briefing Schedule</b>	
Plaintiff brief in support of class cert.	September 17, 2018
Defendant brief in opposition	October 26, 2018
Plaintiff reply brief	November 16, 2018

The parties look forward to submitting their 60-day progress reports, as also provided by the Court's Order, on the following dates: March 24, 2018 (to be filed March 26, 2018); May 23, 2018; July 22 (filed July 23); and September 20 (if needed).

\* \* \*

The Honorable Robert W. Lehrburger

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We thank the Court for its consideration.

Respectfully,

/s/ Adam T. Klein

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